

1 *Counsel Appear On The Following Page*



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NIA MUJADADI-TURAN.

Plaintiff,

V.

MOTOROLA MOBILITY, LLC;
METROPOLITAN LIFE INSURANCE
COMPANY,

Defendants.

CASE NO. 5:15-CV-2752 (EJD)

**JOINT STIPULATION TO CONTINUE
DEADLINE FOR DEFENDANTS
MOTOROLA MOBILITY, LLC AND
METROPOLITAN LIFE INSURANCE
COMPANY TO RESPOND TO
PLAINTIFF'S COMPLAINT**

JOINT STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan (“Plaintiff”) and Defendants Motorola Mobility, LLC (“Motorola”) and Metropolitan Life Insurance Company (“MetLife”) (Plaintiff, Motorola, and MetLife are referred to as the “Parties”), hereby jointly stipulate to a fifth extension of time for Motorola and MetLife to respond to Plaintiff’s Complaint. Pursuant to the Parties Agreement, the deadline for Motorola and MetLife to file their respective responses to Plaintiff’s Complaint will be continued from December 9, 2015 to January 8, 2016. In support of this Stipulation, the Parties agree and stipulate as follows:

1. On June 18, 2015, Plaintiff initiated the present action against Motorola and MetLife in the United States District Court for the Northern District of California. (See ECF, Doc. No. 1.)

2. MetLife was served with the Summons and Complaint in this action on June 26, 2015.

3. Motorola was served with the Summons and Complaint in this action on July 21, 2015.

4. The Parties submitted stipulations extended the deadline for MetLife to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14, 20, 25, 29.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 22, 28, 31.)

5. The Parties submitted stipulations extended the deadline for Motorola to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21, 24, 30.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23, 27, 32.)

6. On December 8, 2015, the Parties have agreed to a further thirty (30) day extension of time for Motorola and MetLife to respond to Plaintiff's Complaint. Accordingly, Motorola and MetLife's respective responses to the Complaint are now due on or before January 8, 2016.

1 7. The Parties are optimistic that a resolution can be reached in this matter and
2 the additional time will afford the parties the opportunity to continue their settlement opportunities
3 without incurring additional costs of litigation.

4 8. This Stipulation will not alter the date of any event or any deadline already
5 fixed by Court order.

6 9. This is the sixth extension of time sought in this matter on behalf of MetLife
7 and the fifth extension of time sought on behalf of Motorola.

8 We hereby attest that we have on file all holographic signatures corresponding to any
9 signatures indicated by a conformed signature (/s/) within this e-filed document.

10 Dated: December 8, 2015

11 _____
12 /s/ Beth A. Davis
13 BETH A. DAVIS
14 Attorneys for Plaintiff
15 NIA MUJADADI-TURAN

16 Dated: December 8, 2015

17 _____
18 /s/ Benjamin A. Emmert
19 BENJAMIN A. EMMERT
20 LITTLER MENDELSON, P.C.
21 Attorneys for Defendant
22 MOTOROLA MOBILITY, LLC

23 Dated: December 8, 2015

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25 /s/ C. Andrew Kitchen
26 C. ANDREW KITCHEN
27 MAYNARD, COOPER, & GALE, LLP
28 Attorneys for Defendant
 METROPOLITAN LIFE INSURANCE
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